

1 THE HONORABLE RICARDO S. MARTINEZ
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 QUNESHIA RAWLS, individually and on
12 behalf of all others similarly situated,

13 Plaintiffs,

14 v.

15 CONVERGENT OUTSOURCING, INC.,

16 Defendant.

Case No. 2:20-cv-01538-RSM

**JOINT STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

17 **I. STIPULATION**

18 Pursuant to LCR 7, Plaintiff QUNESHIA RAWLS and the opt-in Plaintiffs, by and
19 through their counsel, Frank Freed Subit & Thomas, LLP and Anderson Alexander, PLLC, and
20 Defendant CONVERGENT OUTSOURCING INC., by and through its counsel, Jackson Lewis
21 P.C., hereby stipulate and jointly move this Court for an order extending the deadline for
22 Defendant to file and serve its Response to Plaintiff's Complaint from December 4, 2020, to
23 January 8, 2021, so that the parties can engage in good faith efforts to explore the resolution of
24 this action (the parties have already contacted the Court and obtained an extension of all other
25 case management deadlines by six weeks).

26 The parties stipulate that good cause exists under LCR 7, Fed. R. Civ. P 16(b)(2), and
27 LCR 16(b) to continue the above-referenced deadlines because the parties have agreed to engage
28 in a near term, good faith exploration of a resolution of this matter that could obviate any further

1 proceedings. The parties likewise stipulate that the requested extension promotes the policy
2 supporting the voluntary resolution of disputes and preservation of judicial resources, and would
3 facilitate an orderly administration of justice.

4 This Stipulation is based upon the following, and the parties agree:

5 1. That this is only the second request for an extension of time.
6 2. That this request is made in good faith and not for the purpose of delay.

7 3. That nothing in this Stipulation, nor the fact of entering the same, shall be
8 construed as waiving any claim and/or defense held by any party.

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10 **IT IS SO STIPULATED.**

11 DATED this 3rd day of December, 2020.

12 FRANK FREED SUBIT & THOMAS LLP

13 JACKSON LEWIS P.C.

14 By: /s/ Michael C. Subit
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23 By: /s/ Clif Alexander
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28 JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO
COMPLAINT - 2
(Case No. 2:20-cv-00888-RAJ)

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Attorneys for Plaintiff and Putative Class
Members

1 **II. ORDER**
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Pursuant to the above stipulation, it is SO ORDERED.

DATED this 4th day of December, 2020.

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RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE
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